

8

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554**

RECEIVED

AUG 15 2003

Federal Communications Commission
Office of the Secretary

In the Matter of)	
)	
Amendment of 47 CFR Parts 2, 13 and 80 of)	WT Docket No. 00-48
the Commission's Rules Concerning)	
Maritime Communications, Final Rule)	FCC 02-102
)	
Petition for Reconsideration)	RM-9499
)	

**PETITION FOR RECONSIDERATION
by the Radio Technical Commission for Maritime Services (RTCM)**

The Radio Technical Commission for Maritime Services (RTCM) respectfully submits this Petition for Reconsideration in response to the Final Rule published in the Federal Register on August 7, 2003 (68 FR 46957) in the above-captioned proceeding.

The RTCM is a non-profit organization whose objectives include studying and preparing reports on maritime telecommunications practices, needs and technologies with a view toward improving the efficiency and capabilities of maritime telecommunications services, suggesting ways to keep rules and regulations to the minimum essential for effective maritime telecommunications and making recommendations on important issues involving maritime telecommunications.

In regard to Special requirements for 406.0-406.1 MHz EPIRB stations, Section 80.1061.

No. of Copies rec'd 1
List ABCDE

RTCM fully supports the revised regulations in 47 CFR 80.1061, but notes that some technical corrections are needed. We hope the Commission finds these recommended revisions useful, specifically:

1. The preferred way of ordering RTCM standards is through RTCM's secure Website.

We therefore suggest that the RTCM Web address be listed for ordering this standard in section 80.1061(a). This is especially important since RTCM will move to 1800 N. Kent St., Suite 1060, Arlington, VA 22209 on November 1, 2003, and the address and telephone numbers in the present regulation will not be valid.

Accordingly, RTCM recommends that the last sentence of section 80.1061(a) be revised as follows:

(a) * * *

The RTCM Recommended Standards can be purchased from the Radio Technical Commission for Maritime Services, 1800 N. Kent St., Suite 1060, Arlington, VA 22209, www.rtcn.org, email pubs@rtcn.org.

2. Section 80.1061(c) requires certification of the radiobeacon to Appendix B of the RTCM standard by a test facility recognized by one of the Cospas-Sarsat Partners. The "Appendix B" referred to was removed from version 2.1 of the RTCM standard to eliminate needless duplication of Cospas-Sarsat standards T.001 and T.007.

Version 2.1 of the RTCM standard only contains the Appendix A tests of the previous version. The RTCM tests are conducted by test facilities accepted by the U.S. Coast Guard. Furthermore, in § 80.1061(d), it is clear that it is the Coast Guard, and not the test facility, that does the certification to the RTCM standards. RTCM suggests that § 80.1061(c) be revised as follows to reflect these changes and practices:

(c) Prior to submitting a certification application for a 406.0-406.1 MHz radiobeacon, the radiobeacon must be certified by a test facility recognized by one of the Cospas-Sarsat Partners that the equipment satisfies the design characteristics associated with the measurement methods described in Cospas-Sarsat Standards T.001, Specification for Cospas-Sarsat 406 MHz Distress Beacons, Issue 3 - Revision 4, (October 2002) and T.007, Cospas-Sarsat 406 MHz Distress Beacon Type Approval Standard, Issue 3 - Revision 9 (October 2002). Additionally, the radiobeacon must be subjected to the environmental and operational tests associated with the test procedures described in Appendix A of the RTCM Recommended Standards by a test facility accepted by the U.S. Coast Guard for this purpose. Information regarding accepted test facilities may be obtained from Commandant (G-MSE), U.S. Coast Guard, 2100 2nd St. SW, Washington, DC 20593-0001, <http://www.uscg.mil/hq/g-m/mse/lablist/lab161011.pdf>. The Cospas-Sarsat standards are incorporated by reference. The Director of the Federal Register approves this incorporation by reference in accordance with 5 U.S.C. 552(a) and 1 CFR Part 51. Copies of the Cospas-Sarsat Standards can be inspected at the Federal Communications Commission, 445 12th Street, SW, Washington, DC (Reference Information Center) or at the Office of the Federal Register, 800 North

Capitol Street, NW., Suite 700, Washington, DC. The Cospas-Sarsat standards may be obtained from Cospas-Sarsat Secretariat, c/o Inmarsat, 99 City Road, London EC1Y 1AX, United Kingdom, Telephone: +44 20-7728 1391, Facsimile: +44 20-7728 1170; www.cospas-sarsat.org.



R. L. Markle
President
Radio Technical Commission For
Maritime Services

R. L. Markle
Radio Technical Commission For Maritime Services (RTCM)
1800 Diagonal Road, Suite 600
Alexandria, VA 22314-2840
Tel: 703-684-4481
E-Mail: rmarkle@rtcm.org